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Document Number:	Page Count: <i>4</i>
Author/Organization: <i>A.M. Besch/PWT</i>	Facility/WAG/SWMU:
Project Program/Title:	Document Prep. Checklist Attached: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Clearance Form: (when required) Attached: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
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FG <i>A</i> PJ/RS <i>00003</i> Item # <i>0121</i>	

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(4)

RECORD COPY

PWT

Pacific Western Technologies, LTD

Suite B-4,

Oak Ridge, TN 37830

Tel 423-483-0554

Fax 423-483-8838

January 7, 2000

Bechtel Jacobs Company LLC
West Kentucky Technology Park
761 Veteran Avenue
Kevil, Kentucky 42053

ATTENTION: Donnie L. Chumbler

SUBJECT: DOE CONTRACT NO. DE-AC05-98OR22700, SUBCONTRACT 23900-BA-QA003U
Subcontractor Surveillance Submittal, Shipment of Waste Containers to INEEL

Dear Mr. Chumbler:

As required by a work release yet to be issued, enclosed is a copy of the surveillance report on the verification of the container checklist and the loading of two truck trailers for a shipment of 67 containers of hazardous waste to the INEEL WERF incinerator. The follow-up evaluation report has also been performed to verify compliance with BJC/OR-87 Rev. 2, *Integrated Safety Management System*, and BJC/OR-146, *Integrated Safety Management System Supplement*.

Please call me at (270) 441-5170 if you have any questions regarding this surveillance.

Sincerely,



PACIFIC WESTERN TECHNOLOGIES, LTD.

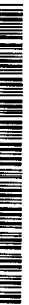
A. M. Bosch
Quality Engineer

Enclosures: Surveillance Report PQA-SU-2000-0244

Cc: Emily J. Blasdel
Ken Campbell, PWT/OR
A. B. Davis, Task Lead
G. L. Dover, Manager of Projects
D. M. Massey, Project Manager
Joyce Sylvester, PWT/OR
File-EMEF-DMC-PAD-RC (2)

PWT- Paducah, KY
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Bechtel Jacobs Company - Paducah
Bechtel Jacobs Company - Paducah
PWT - Oak Ridge, TN

Q-00003-0121



QUALITY ASSURANCE MONITORING REPORT

Type: Surveillance

Title: Waste Shipment to INEEL

Number: PQA-SU-2000-0244

Organization: Waste Projects

Location: C-746-A

Date(s): January 6, 2000

Project Number: RRIJCZWX

Performed by: Adrian M. Bosch, Quality Engineer – (*Pacific Western Technologies*)

Purpose: This monitoring activity was performed to perform an inspection of various information on the container checklist of 68 drums hazardous waste that was scheduled to be shipped to the INEEL WERF incinerator. The information on the container checklist was compared with the information and labels on the 67 drums that had been staged for loading on the truck. The actual loading of two truck trailers was also observed for proper safety practices.

Basis: The reference document for the surveillance is as follows:

- 7-page container checklist printed on the morning of 01/06/2000

Checklist: See attached Checklist

Person's Contacted: The following personnel were contacted during this monitoring activity:

- A. B. Davis, Task Lead, Bechtel Jacobs Company LLC
- Mary Dunsmore, First Choice
- M. E. Williams, EET

Results Summary:

This monitoring activity included detailed data checks for information required by the Department of Transportation for off-site shipment of solid hazardous waste. The 67 containers consisted of 35 55-gallon drums and 32 85-gallon overpack drums (containing 55 gallon drums) which had already been loaded on wooden pallets with the drums on each pallet strapped together and also strapped to the pallets. Each pallet held four drums with the exception of one that held only three.

Three discrepancies were found and are described in the checklist. Only one of these three required correction. The loading of the two truck trailers was conducted in a safe and competent manner.

There was one finding as described below:

QA-SU-99-0244-F1

Container PA-59779-03 had "F001, F002, & F003" codes written on the Hazardous Waste label, but the PSN information on the label had a "D004" code. (The three codes were determined to be correct and the PSN information on the HW label was changed. No further corrective action needed.)

SURVEILLANCE PLAN, CHECKLIST, AND REPORT FORM

Surveillance No: PQA-SU-2000-0244 **Title:** Container Checklist Verification and Waste Shipment 01/06/2000
Project: Waste Shipments to INEEL WERF Incinerator **Follow-up to Surveillance No.:** N/A (If applicable)

Surveillance Plan: Verify agreement between containers to be shipped with container list and observe loading of truck trailers.

Scope: Review Container Checklist to compare with information on drums and observe loading of drums onto the trucks.

Requirements: Container checklist needs to agree with information on drums and loading needs to be performed in a safe manner to implement ISMS.

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Item	Surveillance Characteristic	A;F;O;P	PAAA y/n	Remarks
1	The container ID label (PA-xxxx) on the top and side of the containers are identical, are the same base number (xxxx) as written on the container itself, and are the same as on the container checklist.	A	N	All numbers were in agreement on each of the 67 containers.
2	The EPA codes written on the Hazardous Waste label agree with any other codes in the Proper Shipping Name (PSN) on the container and on the container checklist.	F	N	Container PA-59779-03 had "F001, F002, & F003" codes written on the Hazardous Waste label, but the PSN information on the label had a "D004" code. The three codes were determined correct and the PSN information was changed.
3	The actual container size and type is the same as is listed on the container checklist.	A	N	All container sizes were in agreement; container types were in agreement whenever the information was available on an affixed label. The bottom of the other containers were not inspected to check for this number since they had already been strapped to the pallets for shipment.
4	The gross weight written on the side of the container (usually two places), written on the top of the container, and printed on the container checklist are the same.	A	N	Container PA-57794-04 had the date written on the side of the container twice with the second time where the weight was to be written. The weight was shown in other locations and this was not considered to be a problem.
5	The actual gross weight is less than the DOT weight limit for that type of container.	A	N	All containers were within allowed gross weight limits. The greatest loading was 25.36% for container PA-5083.
6	The information in the Proper Shipping Name (PSN) on the Hazardous Waste label is identical to the PSN description on the container checklist.	A	N	In addition to the problem with PA-59779-03 as discussed in item #2 above, the PSN on the HW label for container PA-57786-01 did not specify "Co-60" as was on container list. The final container list printed for shipment did not have "Co-60" and a check of container information showed that this indeed was not a contaminant. No corrective action needed.

Legend: A: Acceptable F: Finding O: Observation P: Proficiency
 y: Potential PAAA review recommended n: PAAA review not recommended

SURVEILLANCE PLAN, CHECKLIST, AND REPORT FORM

Surveillance No: PQA-SU-2000-0244 Title: Container Checklist Verification and Waste Shipment 01/06/2000
Project: Waste Shipments to INEEL WERF Incinerator Follow-up to Surveillance No.: N/A (If applicable)

Surveillance Plan: Verify agreement between containers to be shipped with container list and observe loading of truck trailers.

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Item	Surveillance Characteristic	A;F;O;P	PAAA y/n	Remarks
7	Each container has a yellow Hazardous Waste label attached plus either a DOT "9" or a "Radioactive - LSA" label attached as specified on the container checklist.	A	N	All containers had the Hazardous Waste label plus the second label specified on the container checklist.
8	The movement of container pallets using a forklift truck and the loading of the truck trailers was conducted in a safe manner.	A	N	Forklift use was judged to be safely conducted. The portable loading ramp was properly secured to each trailer before it was loaded. The positioning of all pallets using the forklift was very straight which allowed the carpenters to secure 2x4s to the trailer floor with only minimal excess clearance with the pallets.

Legend: A: Acceptable F: Finding O: Observation P: Proficiency
y: Potential PAAA review recommended n: PAAA review not recommended

Planned by: A. M. Bosch 01/06/2000
Evaluator Date

Report Completed: A. M. Bosch 01/07/2000
Evaluator Date

Plan Approved: AB Davis 1-7-2000
Subject Matter Expert Date

Report Approved: AB Davis 1-7-2000
Reviewer Date